

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER HOUGH,

Plaintiff,

- against -

ONIKA TANYA MARAJ, AKA (“NICKI MINAJ”) and KENNETH PETTY, AKA (“ZOO”),

Defendants.
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: Civil Action No. 21-cv-04568
: (ENV) (JRC)
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: **DECLARATION OF STEVEN D.**
: **ISSER**
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STEVEN D. ISSER, declares under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to the Bar of this Court and am counsel to Defendant Kenneth Petty (“Defendant”) in the above-captioned action. I am fully familiar with the facts set forth below and I submit this Declaration in support of Defendant’s motion to vacate the Certificate of Default entered against Defendant, pursuant to Rule 55(c) of the Federal Rules of Civil Procedure.

2. Attached hereto as Exhibit (“Ex.”) 1 is a true and correct copy of the Amended Complaint in this action, dated September 2, 2021, filed by Plaintiff Jennifer Hough (“Plaintiff”).

3. Attached hereto as Ex. 2 is a true and correct copy of emails dated October 13, 2021 between Judd Burstein, Esq. (counsel for co-defendant Onika Tanya Maraj) and Tyrone Blackburn, Esq. (counsel to the Plaintiff this action), which were previously filed with the Court.

4. Attached hereto as Ex. 3 is a true and correct copy of the Affidavit of Service, dated September 16, 2021, concerning purported service on Defendant, which was previously filed by the Plaintiff in this action.

5. Attached hereto as Ex. 4 is a true and correct copy of the Affirmation in

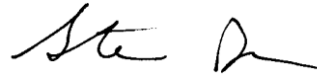
Support of Request for Certificate of Default by Tyrone Blackburn, Esq., affirmed on October 11, 2021, previously filed by Plaintiff in this action.

6. Attached hereto as Ex. 5 is a true and correct copy of the Request for a Certificate of Default filed by Plaintiff in this action, dated October 11, 2021

7. Attached hereto as Ex. 6 is a true and correct copy of the Certificate of Default entered against Defendant in this action, dated October 19, 2021.

8. Judd Burstein, Esq. referred Defendant to me for representation and I was fully retained by Defendant the evening of October 20, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of October, 2021, in the State of New Jersey, County of Union.



Steven D. Isser